

REMARKS

Rejection of claims 1-6, and 9-16 under 35 U.S.C. §103(a) as being unpatentable over US 4,760,570 (Acampora) in view of US 5,475,679 (Munter)

Applicant respectfully traverses the rejection of claims 1-6, and 9-16.

In regard to claim 1, the Office Action on page 3, item 3, acknowledges that Acampora does not disclose the feature of claim 1 of a controller uncoupled from the data link selecting the destination module and the destination module is selected without employing the data link. However, the Office Action contends that this is taught by Munter, that is, that “Munter teaches a controller uncoupled from the data link selecting the destination module and the destination module is selected without employing the data link (e.g., see Fig. 5, Core controller 80; column 6, lines 3-13).” Applicant respectfully disagrees.

Munter discloses an ATM switch that includes N input buffer modules, N output buffer modules, and an N port space switch core. The space switch core connects the input and output buffer modules under the control of a core controller positioned in the space switch core. The core controller is used to avoid collision at the space switch core outputs. The controller receives a connection request from the input buffer modules and sets up crosspoint connections in the space switch core and sends a connection grant back to the input buffer modules. See col. 4, lines 55-65 of Munter.

It appears that the Office Action equates Applicant’s “controller” with Munter’s “core controller.” Munter’s core controller is basically used to avoid collision at the space switch core outputs. The core controller receives status information (a connection request) from the input buffer modules (equated to Applicant’s source modules). The received status information indicates to the core controller that a connection is requested to the output port. Thus, it is clear that the output port is selected by the input buffer module, and not by the core controller. For example, the core controller merely sets up crosspoint connection with the output buffer module based on the status information, indicating the output buffer module, received from the input buffer module. See col. 4,

lines 55-65 of Munter. In contrast, claim 1 recites “selecting, by a controller uncoupled from the data link, a destination module of the plurality of destination modules.”

Additionally, Munter’s core controller simply sets up crosspoint connection between the input and output buffer modules, and makes no mention of informing the output buffer module of the inbound time slot at which the broadcast data is received. In contrast, claim 1 recites “informing, by the controller, the selected destination module of the inbound time...receiving, by the selected destination module, the broadcast data via the inbound time slot.”

Therefore, neither Acampora nor Munter, individually or in combination, teaches or suggests the above mentioned claim limitations as recited in claim 1. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claim 1 under 35 U.S.C §103(a).

Regarding independent claim 9, Applicant respectfully submits that the above discussed arguments apply equally to the limitations of claim 9. Applicant therefore respectfully requests withdrawal of the rejection of claim 9 under 35 U.S.C §103(a).

Dependent claims 2-6, and 10-16 depend from, and include all the limitations of independent claims 1 and 9. Therefore, Applicant respectfully requests reconsideration of dependent claims 2-6, and 10-16 and requests the withdrawal of the rejection.

Rejection of claims 7, 8, 17-24 under 35 U.S.C. § 103(a) as being unpatentable over US 4,760,570 (Acampora), in view of US 5,475,679 (Munter), and in view of US 4,392,222 (Ando)

Claims 20 and 23 respectively include features of “the destination module is selected by the controller uncoupled from the switching system” and “selecting, by a controller uncoupled from the data links, a destination module from among the plurality of destination modules.” As described in detail above, these features are not taught by Acampora or Munter. Ando also does not address these deficiencies of Acampora and Munter. Therefore, Applicant requests reconsideration and withdrawal of the rejection of claims 20 and 23 under 35 U.S.C. § 103(a) over Acampora, Munter, and Ando.

Dependent claims 7 and 8 depend from, and include all the limitations of independent claim 1, dependent claims 17-19 depend from, and include all the limitations of independent claim 9, dependent claims 21-22 depend from, and include all the limitations of independent claim 20, and dependent claim 24 depends from, and include all the limitations of independent claim 23. Therefore, Applicant respectfully requests reconsideration of dependent claims 7, 8, 17-19, 21-22, and 24 and requests the withdrawal of the rejection.

Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact Applicant's attorney at the telephone number indicated below.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,

/Steven May/ 10/15/2008

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